

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

SHASTA WINN,
pro se Plaintiff,

vs.

THE HIGHER EDUCATION COORDINATING COMMISSION (HECC), RAMONA
RODAMAKER, VERONICA DUJON, SEAN BRADY, THE OREGON HEALTH AUTHORITY
(OHA), TINA KOTEK, SAM CHAPMAN, TOM ECKERT, AND AFFILIATED PARTIES,
Defendants

Case No # 6:24-CV-00004

Motion to Compel Acknowledgment of Summons & Response to Discovery Requests

I, Shasta Winn, the plaintiff in the above-mentioned case, hereby bring this motion to the court due to a significant discrepancy in the acknowledgment of service of summons. On February 9, 2024, a hired service process company provided written affidavits (electronically filed 2/16/24), attesting to the service of summons for the HECC, OHA, Sean Brady, Ben Cannon, Ramona Rodamaker, Veronica Dujon, and Tina Kotek, to authorized officials at the HECC and DOJ. Despite this confirmation, on February 16, 2024, the DOJ attorney representing the defendants, Tracy White, refused discovery requests, claiming to have no record of anyone being served. This discrepancy raises concerns about the proper progression of this case.

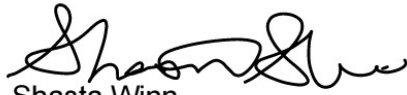
This motion seeks the court's intervention to compel acknowledgment of the summons, and response to discovery requests, ensuring a fair and accurate judicial process.

Proposed Order:

WHEREFORE, the plaintiff respectfully requests this Honorable Court to issue the following order:

- a. Directing the defendants, specifically the representatives of the Department of Justice, to promptly acknowledge receipt of all summons served on February 9, 2024, as evidenced by the filed affidavits.
- b. Requiring the defendants to provide a formal response to the plaintiff within 7 days of the order confirming their awareness of the pending legal proceedings.
- c. Requiring the defendants respond to requests for affidavits and interrogatories within 30 days of their receipt.

d. Granting any further relief deemed just and necessary by the court to ensure the fair and accurate progression of this case, and for all costs and fees incurred in bringing this motion.

A handwritten signature in black ink, appearing to read 'Shasta Winn', is written over the printed name.

Shasta Winn

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Date: 2-16-2024